UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

	)	
UNITED STATES OF AMERICA,	)	
	)	
	)	
v.	)	Criminal No. 19-10081-IT
	)	
	)	
JOVAN VAVIC,	)	
	)	
Defendant.	)	
	)	

MOTION FOR LEAVE TO FILE REPLY BRIEF TO JOVAN VAVIC'S OPPOSITION TO MOTION TO INTERVENE AND QUASH TRIAL SUBPOENA, DOC. NO. 1127

Pursuant to Local Rule 7.1(b)(3) of the Local Rules of the United States District Court for the District of Massachusetts, Joseph Aguirre, Alexandra Reisman (nee Bitterlin), and Scott Wandzilak respectfully move for leave to file a reply brief to the defendant Jovan Vavic's opposition to motion to quash the subpoenas seeking their trial testimony, Doc. No. 1127. As reasons therefore, Aguirre, Reisman, and Wandzilak state that they filed a motion to intervene and quash Vavic's trial subpoenas. Doc. No. 1094. Vavic filed an opposition to the motion and raised issues that warrant a response to aid the Court in its consideration of the motion. Doc. No. 1127.

For the foregoing reasons, Aguirre, Reisman, and Wandzilak respectfully request that this Court grant them leave and allow them to file a reply brief in this matter.

Respectfully submitted,

s/ Glenn A. MacKinlay
Glenn A. MacKinlay
McCarter & English, LLP
265 Franklin Street
Dated: March 9, 2022   Boston, MA 02110

CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 7.1

I, Glenn A. MacKinlay, hereby certify that counsel for Aguirre, Reisman, and Wandzilak

has conferred with counsel for the government, and with counsel for the defendant, Jovan Vavic,

in good faith with respect to the motion to quash and were unable to resolve or narrow the issues

presented.

Date: March 9, 2022

s/ Glenn A. MacKinlay
Glenn A. MacKinlay

CERTIFICATE OF SERVICE

I hereby certify that on this date this document filed through the CM/ECF system will be

sent electronically to the registered participants as identified on the NEF and paper copies will be

sent to those indicated as non-registered participants.

s/ Glenn A. MacKinlay
Glenn A. MacKinlay